

**[Exempt From Filing Fee
Government Code § 6103]**

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Attorneys for Defendant JOSE HUIZAR

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

MAYRA ALVAREZ,

Plaintiff,

vs.

JOSE HUIZAR, an individual; CITY OF LOS
ANGELES, a municipality; and DOES 1-10,
inclusive,

Defendants.

Case No. 18STCV01722

[Assigned for All Purposes to:
Hon. Richard E. Rico, Dept. 17]

**DECLARATION OF JAMES H.
DEMERJIAN IN SUPPORT OF MOTION
TO STAY ALL PROCEEDINGS
PENDING RESOLUTION OF CRIMINAL
INVESTIGATION**

**[Filed concurrently with Motion to Stay and
Declaration of Mary Carter Andruess]**

Date: June 24, 2019
Time: 8:30 a.m.
Dept.: 17

Reservation No.: 910494920888

Action Filed: October 22, 2018
Trial Date: None Set

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DECLARATION OF JAMES H. DEMERJIAN

I, JAMES H. DEMERJIAN, hereby declare and state as follows:

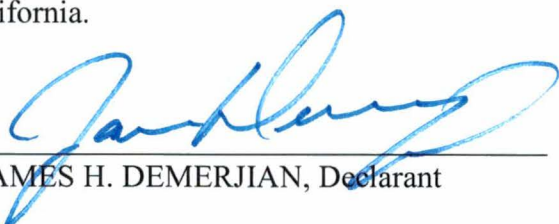
1. I am an attorney at law duly admitted to practice before all courts of the State of California. I am a senior counsel in the law firm of Ballard Rosenberg Golper & Savitt, LLP, counsel of record for Defendant JOSE HUIZAR (Defendant Huizar). I make this declaration in support of Defendant Huizar's motion to stay all proceedings pending resolution of criminal investigation. I have direct and personal knowledge of the facts set forth herein, and if called and sworn as a witness, I would and could testify competently to the truth of the matters set forth herein.

2. Since filing her lawsuit, Plaintiff Alvarez has served Defendant Huizar with extensive discovery, including Special Interrogatories, 187 Requests for Production of Documents, and 83 Requests for Admissions (along with the corresponding form interrogatory no. 17.1).

3. My office represents Defendant Huizar in a second lawsuit filed by Plaintiff Mayra Alvarez's former colleague, Pauline Medina – Case No. 18STCV03011. Plaintiff Medina makes similar overlapping allegations regarding alleged complaints. Plaintiff Medina is represented by the same attorney representing Plaintiff Alvarez. My office has filed a motion to stay all proceedings on Defendant Huizar's behalf in the Medina matter as well, and that motion is scheduled to be heard on June 20, 2019.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed May 24, 2019, at Encino, California.


JAMES H. DEMERJIAN, Declarant

PROOF OF SERVICE

Alvarez v. Huizar, et al.
LASC Case No. 18STCV01722

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 15760 Ventura Boulevard, Eighteenth Floor, Encino, CA 91436.

On May 24, 2019, I served true copies of the following document(s) described as **DECLARATION OF JAMES H. DEMERJIAN IN SUPPORT OF MOTION TO STAY ALL PROCEEDINGS PENDING RESOLUTION OF CRIMINAL INVESTIGATION**, on the interested parties in this action as follows:


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BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List. I am "readily familiar" with Ballard Rosenberg Golper & Savitt, LLP's practice for collecting and processing correspondence for mailing with the United States Postal Service. Under that practice, it would be deposited with the United States Postal Service that same day in the ordinary course of business. Such envelope(s) were placed for collection and mailing with postage thereon fully prepaid at Encino, California, on that same day following ordinary business practices.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 24, 2019, at Encino, California.


Lisa Chiarella